EXHIBIT 2

Stephen Stern

From: Stephen Stern

Sent: Friday, October 1, 2021 10:23 PM **To:** 'michaelrwhite@comcast.net'

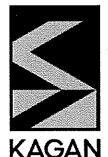
Cc: 'Gregory Jordan'; Thomas J. Gagliardo; Heather Yeung

Subject: RE: Boshea v. Compass Marketing, Inc. - Response to Subpoena **Attachments:** Notice of Deposition to Michael White (00153348xEC90E).pdf

Michael:

Since I did not hear back from you, I have set the deposition for one of the dates noted below. Attached is a copy of the notice of deposition.

Stephen



Stephen B. Stern, Esq. stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC

(410) 793-1610 (direct) (410) 216-7900, ext. 1009 (410) 705-0836 (fax) 238 West Street Annapolis, Maryland 21401 www.kaganstern.com

From: Stephen Stern

Sent: Tuesday, September 28, 2021 6:04 PM

To: michaelr.white@comcast.net

Subject: Boshea v. Compass Marketing, Inc. - Response to Subpoena

Michael:

As I am sure you know by now, the court has denied your motion to quash the subpoena that was served on you in the above-referenced matter (except to the extent that the subpoena sought documents related your communications with BizFilings/Compass Marketing's Registered Agent). In the event you did not already know the outcome, I have attached a copy of the court's order for you to review.

Please produce all responsive documents by October 4.

As for scheduling your deposition, please let me know your availability October 19, 20, and 21.

Stephen

Case 1:21-cv-00309-ELH Document 63-2 Filed 10/25/21 Page 3 of 6



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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND (Northern Division)

NOTICE OF DEPOSITION OF MICHAEL R. WHITE

PLEASE TAKE NOTICE THAT Defendant Compass Marketing, Inc., by and through its undersigned counsel and pursuant to the Federal Rules of Civil Procedure and the Local Rules of this Court, will take the deposition on oral examination of Michael R. White. This deposition notice follows the Court's Order denying your Motion to Quash and is in furtherance of the subpoena that was previously served on you. The deposition will take place at 8 Church Circle, Annapolis, Maryland 21401. The deposition will take place on the Fourth Floor, Conference Room 407, commencing at 10:00 a.m. on October 21, 2021, and may be continued from day to day or to such other date as may be necessary until completed. Please note that masks are required in the courthouse and must be worn at all times.

The deposition will be taken before a court reporter or other person authorized to administer oaths and will be conducted in accordance with the Federal Rules of Civil Procedure and the Local Rules of this Court. The deposition will be taken for the purposes of discovery, for use at trial in this matter, and for any other purpose permitted under the applicable rules. The deposition will be recorded stenographically and will be videotaped.

Dated: October 1, 2021

Respectfully submitted,

/s/ Stephen B. Stern

Stephen B. Stern, Bar No. 25335 Heather K. Yeung, Bar No. 20050

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Counsel for Defendant Compass Marketing, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 1st day of October, 2021, the foregoing Notice of Deposition for Michael R. White was served via electronic mail to:

Thomas J. Gagliardo Gilbert Employment Law, PC 1100 Wayne Avenue, Suite 900 Silver Spring, MD 20910 Email: tgagliardo@gelawyer.com

and

Gregory J. Jordan
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Attorneys for Plaintiff David Boshea

/s/ Stephen B. Stern
Stephen B. Stern